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VIA ELECTRONIC FILING (CM/ECF)

June 27, 2023

Hon. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

RE: *Doe v. Jackson et al.*, Case No. 1:23-CV-04910 (ALC)

Dear Judge Carter:

We represent defendant Joshua Jackson in connection with the above-referenced matter. Pursuant to Your Honor's Individual Practice 6.D., we respectfully request permission to file our opposition to plaintiff's motion to proceed pseudonymously (ECF Nos. 13-14) under seal pending Your Honor's ruling on the motion.

Our opposition names plaintiff and provides critically important context concerning her public persona. While plaintiff does not have a legal basis to proceed anonymously or under seal, we believe it is inappropriate to file our response in public view, thus preempting Your Honor's decision.

Before filing this letter-motion, we consulted plaintiff's counsel, who advised that plaintiff opposes our request to file under seal and that we should instead file a redacted copy of our response in public view. We do not believe this alternative is reasonable because it would require us to apply extensive redactions that would render the content unreadable.

Respectfully submitted,



John F. Lauro

cc: Counsel of Record (via CM/ECF)